

# Exhibit M

**From:** [Shannon Liss-Riordan](#)  
**To:** [Scott, Jessica](#)  
**Cc:** [McHugh, Joe](#); [Jeremy Abay](#); [Creighton, Virginia](#); [Kennedy, Shanicka](#)  
**Subject:** RE: Claiborne -- expenses and follow-up re Garg errors  
**Date:** Friday, October 25, 2024 4:48:40 PM  
**Attachments:** [image001.png](#)

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Jessica - We made reasonable estimates based upon a ridiculous amount of data to have to go through to calculate employees' pay – while your client should have been keeping contemporaneous track of this all along. We look forward to working with you to figure out how best to take care of this mess your client created.

Again, as much as I love trading emails with you, I'm going to sign off with you for the weekend and wish you a good weekend.

Shannon

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**From:** Scott, Jessica <[scott@wtotrial.com](mailto:scott@wtotrial.com)>  
**Sent:** Friday, October 25, 2024 5:38 PM  
**To:** Shannon Liss-Riordan <[sliss@llrlaw.com](mailto:sliss@llrlaw.com)>  
**Cc:** McHugh, Joe <[joseph.mchugh@fedex.com](mailto:joseph.mchugh@fedex.com)>; Jeremy Abay <[jabay@llrlaw.com](mailto:jabay@llrlaw.com)>; Creighton, Virginia <[Creighton@wtotrial.com](mailto:Creighton@wtotrial.com)>; Kennedy, Shanicka <[shanicka.kennedy@fedex.com](mailto:shanicka.kennedy@fedex.com)>  
**Subject:** Re: Claiborne -- expenses and follow-up re Garg errors

Let me just be clear about one key point. Some of the most egregious examples of Ms. Garg's errors were ignoring actual produced paystubs and, instead, inventing her own numbers. This happened quite frequently. Try to shift the blame, unsuccessfully, as much as you'd like, but there can be no blame shifting for this.

On Oct 25, 2024, at 3:20 PM, Shannon Liss-Riordan <[sliss@llrlaw.com](mailto:sliss@llrlaw.com)> wrote:

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Yes, Joe, assuming we win, and we are confident we will, FedEx will be on the hook for not having kept complete and accurate pay records.

I'm done with this conversation. Have a good weekend.

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